

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHN DOE,  
Plaintiff

v.

CITY OF SOMERVILLE,  
JOSH WAIRI,  
Defendants

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No. 1:22-cv-10091-RGS

**AFFIDAVIT OF JOHN DOE**

1. I am the individual identified as John Doe in the above action.
2. I execute this affidavit based on my own memory and belief and in support of Plaintiff's Motion for Default Judgment Against Defendant Wairi.
3. I brought the above action, which is a case arising out of my teacher filming me in the nude without my knowledge or consent when I was a minor.
4. The allegations in that complaint that relate to me are accurate to the best of my memory and belief.
5. Specifically, I was a student at the Healey School and attended the field trip where Defendant Wairi filmed boys in the shower.
6. As a result of this intrusion and betrayal of trust, I have suffered and continue to suffer from severe emotional distress.
7. I trusted and liked Wairi, my teacher, and he abused me and my classmates for his own sexual gratification.
8. In the years since the field trip, I learned that Defendant Wairi comingled the footage from the field trip with his other child pornography.
9. I also learned that Defendant Wairi has shared parts of his child pornography collection with others.
10. This information is particularly devastating because I do not know where the images of me may be, who may currently have them, if I am identifiable, and if they have continued to be distributed.
11. Because of Defendant Wairi's actions, I don't trust authority figures, particularly teachers.

12. I suffer from sleep disturbances, insomnia, hopelessness, fear of crowds, intrusive memories, and disturbing memories.
13. Because I don't know where the images of me are, the abuse isn't a distant memory. Instead, I worry that I will learn that the images are still out there being shared.
14. In high school, I sporadically spoke to a therapist, but I didn't find the sessions helpful.
15. As a young man, I continue to think about what happened to me and try to move forward. It's likely that I will return to therapy or seek other treatment in the future.

Signed under the pains and penalties of perjury on January 4, 2023.

John Doe  
John Doe (Jan 4, 2023 13:42 EST)  
John Doe